## UNITED STATES DISTRICT COURT

## FOR THE

## DISTRICT OF VERMONT

STATE OF VERMONT,	)	
Plaintiff	)	
	)	
V.	)	Docket No. 2:13-cv-170
	)	
MPHJ TECHNOLOGY INVESTMENTS,	)	
LLC,	)	
Defendant	)	

## MPHJ TECHNOLOGY INVESTMENTS, LLC'S MOTION FOR SANCTIONS UNDER RULE 11, 28 U.S.C. § 1927, AND THE COURT'S INHERENT AUTHORITY

Defendant MPHJ Technology Investments, LLC ("MPHJ") respectfully moves this Court to impose sanctions under FED. R. CIV. P. 11(b & c), 28 U.S.C. § 1927, and the Court's inherent authority. The background, facts, and law relevant to demonstrating MPHJ is entitled to the relief requested by this Motion are set forth in the accompanying Memorandum. On the basis of the presentation made in that Memorandum, MPHJ respectfully requests this Court enter Findings and an Order finding that the conduct of the Plaintiff State of Vermont and its counsel have violated the requirements of Rule 11(b), and requests this Court to impose such sanctions as are permitted under Rule 11(c)(4). 28 U.S.C. § 1927, and as this Court finds appropriate, and as

MPHJ may show itself to be entitled in the accompanying Memorandum and subsequent briefing.

Burlington, Vermont Dated: February 7, 2014

/s/ Andrew D. Manitsky

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